

UNITED STATES OF AMERICA,

- vs -

JEFFREY ANDREWS,
CHAD BEENE,
ADAM BROSNIUS, and
ROBERT SCHNEIDERMAN,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

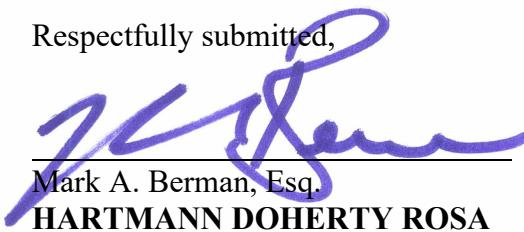
Criminal No. 20-578 (JMV)

DEFENDANT ADAM BROSNIUS'
NOTICE OF PRETRIAL MOTIONS

TO ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Defendant Adam Brosnius, through his attorneys Hartmann Doherty Rosa Berman & Bulbulia, LLC (Mark A. Berman, Esq., appearing) hereby moves before the Honorable John Michael Vazquez, U.S.D.J., for entry of an Order dismissing Counts One and Eight of the Indictment, directing the government to file a bill of particulars, striking specified surplusage, directing the government to provide notice of Federal Rule of Evidence 404(b) evidence it intends to introduce at trial on or before a reasonable date-certain prior to trial, and allowing Defendant to join in those pretrial motions filed by his co-defendants that are relevant to him. In support of these motions, Defendant will rely upon the brief filed herewith.

Respectfully submitted,



Mark A. Berman, Esq.

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*Attorneys for Defendant
Adam Brosnius*

Dated: December 15, 2021